

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CASE NO. 08-11289-TPA
	:	
CREDITRON FINANCIAL CORPORATION	:	
DBA TELATRON MARKETING GROUP, INC.	:	CHAPTER: 11
DEBTOR	:	
	:	
JOHN C. MELARAGNO, TRUSTEE	:	DOCUMENT NO. ____
MOVANT	:	
	:	
VS.	:	Related Doc. No. ____
	:	
M-DOT, INC.	:	
RESPONDENT	:	

**JOINT MOTION TO APPROVE SETTLEMENT**

AND NOW, to-wit, this 12<sup>th</sup> day of April, 2011, the undersigned Chapter 11 Trustee and Attorney Pro Se and counsel for the named Respondent hereby propose the following Joint Motion to Approve Settlement averring in support thereof as follows:

1. The Debtor, CREDITRON FINANCIAL CORPORATION dba TELATRON MARKETING GROUP, INC. (Telatron) performed services for M-DOT, Inc. (M-DOT), a Pennsylvania Corporation.
2. M-DOT, Inc. maintains a business address of 130 W. 8<sup>th</sup> Street, Erie, PA 16501.
3. As a result of the services performed, Telatron issued invoices totaling \$47,439.28 to M-DOT, Inc. for the period from October 6, 2008 through February 12, 2009.
4. M-DOT has alleged that some of the invoices included charges for services that had not been pre-approved by M-DOT in violation of the agreement between the parties.
5. M-DOT has offered to pay the sum of \$25,000.00 as payment in full for the outstanding M-DOT invoices for the period from October 6, 2008 through February 12, 2009 that total \$47,439.28, and in complete settlement of claims between M-DOT and Telatron, to be

evidenced by the exchange of mutual general releases. Telatron desires to accept this settlement offer, in light of the uncertainty and cost of litigating this matter.

6. Payment shall be made within ten (10) days of the date of the approval of this Motion.

7. The Trustee believes that the Settlement set forth above is in the best interest of the estate as it will result in a prompt resolution of this matter without incurring any additional attorney's fees or costs at the expense of the estate.

WHEREFORE, the Trustee seeks an Order approving this Joint Motion to Approve Settlement, as set forth herein.

RESPECTFULLY SUBMITTED,  
MELARAGNO & PLACIDI

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